

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE:

LAPEER INDUSTRIES, INC

Case No. 20-48744  
Chapter 11 proceeding

Debtor.

Judge: Maria L. Oxholm

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**DEBTOR'S STATUS REPORT WITH RESPECT TO DEBTOR'S SECOND MOTION  
FOR ENTRY OF AN ORDER (I) APPROVING BIDDING PROCEDURES, (II)  
SCHEDULING AN AUCTION AND A SALE HEARING IN CONNECTION WITH THE  
SALE OF SUBSTANTIALLY ALL OF DEBTOR'S ASSETS, (III) ESTABLISHING  
DATES AND DEADLINES IN CONNECTION WITH THE SALE, (IV) APPROVING THE  
FORM OF THE ASSET PURCHASE AGREEMENT, AND (V) GRANTING RELATED  
RELIEF; AND FOR ENTRY OF AN ORDER (A) AUTHORIZING THE SALE OF  
SUBSTANTIALLY ALL OF DEBTOR'S ASSETS FREE AND CLEAR OF LIENS,  
CLAIMS, ENCUMBRANCES, AND INTERESTS, AND (B) APPROVING THE  
ASSUMPTION AND ASSIGNMENT OF CERTAIN EXECUTORY CONTRACTS AND  
UNEXPIRED LEASES, AND (C) GRANTING RELATED RELIEF; AND FOR ENTRY  
OF AN ORDER ESTABLISHING AN ADMINISTRATIVE CLAIMS BAR DATE**

NOW COMES Debtor Lapeer Industries, Inc., by and through its attorneys Winegarden, Haley, Lindholm, Tucker, and Himelhoch PLC, and for its Status Report states as follows:

The Debtor files this Status Report to advise the Court of the current status of the Debtor's Motions (Doc. 353 and Doc. 360). At the hearing scheduled for February 11, 2021 The Debtor intends to request a second one week adjournment of the hearings with respect to both of the Debtor's motions and with respect to the United States Trustee's Motion to convert (Doc.334). The Debtor is currently negotiating with the objecting parties in an effort to obtain an agreed upon adjournment of the hearings. Debtor will not seek to proceed with its motions and instead, if necessary, will argue the merits of its request for an adjournment. In connection with this argument, the Debtor is prepared to offer an

update from its CRO as to the status of continuing negotiations. The Debtor also believes that the proposed stalking horse bidder will be available to offer an update on its efforts to cement funding for the proposed purchaser.

If it appears that an agreement will be reached with respect to the adjournment proposal, the Debtor will file a Stipulation granting the adjournment, or if a Stipulation has not yet been agreed upon the Debtor will file a further status report to advise the Court of this fact.

Respectfully Submitted,  
WINEGARDEN, HALEY, LINDHOLM,  
TUCKER & HIMELHOCH, P.L.C.  
Attorneys for the Debtor

Dated: February 10, 2021

By: /s/ Zachary T. Tucker  
**Zachary R. Tucker (P-75263)**